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PFIZER, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

RANDALL J. SLOAN, an individual,  
Plaintiff,

vs.

PFIZER, INC., a Delaware corporation; and  
DOES 1 through 40, inclusive,

Defendants.

Case No. CV-08-1849 BZ

**DEFENDANT PFIZER, INC.'S  
NOTICE OF MOTION AND MOTION  
TO TRANSFER VENUE [28 U.S.C. §  
1404(a)]; MEMORANDUM OF POINTS  
AND AUTHORITIES IN SUPPORT  
THEREOF**

**[Declaration of Lynne Buongiorno in  
Support of Motion and Request for  
Judicial Notice filed concurrently  
herewith]**

Date: July 16, 2008  
Time: 10:00 a.m.  
Ct. G, 15<sup>th</sup> Floor  
MJ: Hon. Bernard Zimmerman

Complaint Filed: 12/11/2007  
Case Removed to Federal Court: 4/7/2008

**PLEASE TAKE NOTICE** that on July 16, 2008 at 10:00 a.m. or as soon thereafter as the motion may be heard in Courtroom G of the above-entitled Court, located at 450 Golden Gate Avenue, San Francisco, California, 94102, Defendant PFIZER, INC. ("Pfizer") will and hereby does move the Court for an order transferring the above-captioned action from the Northern District of California to the Southern District of New York pursuant to 28 U.S.C. §1404(a). Pfizer has brought this motion on the grounds that the circumstances of this case require that trial

1 be conducted in the Southern District of New York for the convenience of the parties and  
2 witnesses, and in the interests of justice.

3 This motion is based upon the Notice of Motion and Memorandum of Points and  
4 Authorities in Support of hereof, the Declaration of Lynne Buongiorno, the Request for Judicial  
5 Notice, as well as any other papers or evidence that may properly come before this Court.

6 Dated: June 5, 2008

Respectfully submitted,

JACKSON LEWIS LLP

9 By: /s/ Janine R. Hudson  
10 Mitchell F. Boomer  
11 Janine R. Hudson  
12 Attorneys for Defendant  
13 PFIZER, INC.  
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